



WALTER M. COLLERAN (1912-1998)  
RICHARD L. O'HARA  
JOHN F. MILLS (1939-2003)  
EDWARD J. GROARKE  
CHRISTOPHER P. O'HARA  
CAROL O'ROURKE PENNINGTON  
DENIS A. ENGEL  
JOHN S. GROARKE\*  
MICHAEL D. BOSSO

STEVEN C. FARKAS\*\*  
THOMAS P. KEANE\*\*\*  
DAMIEN O. MAREE\*\*  
TAYLOR ANNE WAITES  
PATRICIA L. BOLAND  
GLENN A. KREBS +

PARALEGALS  
LAURA A. HARRINGTON  
KRISTINE M. MURPHY  
LILLY PIAZZA

\* ALSO ADMITTED IN NEW JERSEY  
\*\* ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*\* ALSO ADMITTED IN NEW JERSEY AND  
CONNECTICUT  
+ OF COUNSEL

August 11, 2022

**VIA ECF**

Honorable Eric N. Vitaliano, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: A.A. Medical P.C. v. Iron Workers Locals 40, 361 and 417 Health Fund  
Case No.: 2:22-cv-01249

Your Honor:

This firm represents Defendant Iron Workers Locals 40, 361 and 417 Health Fund ("Defendant" or the "Health Fund") in the referenced matter.

As per your motion bundle rules, enclosed please find courtesy copies of the following:

1. Defendant's Notice of Motion,
2. Declaration of Brian J. Sabbagh in Support of Defendant's Motion to Dismiss with Exhibits A-F
3. Memorandum of Law in Support of Defendant's Motion to Dismiss
4. Declaration of Vedant Vaksha, M.D. in Opposition to Defendant's Motion to Dismiss the Complaint
5. Memorandum in Opposition to Defendant's Motion to Dismiss the Complaint
6. Defendants Reply Memorandum of Law in Support of its Motion to Dismiss

Also, please be aware that the motion documents listed above are exact copies of the electronically filed documents that were uploaded to the Court's ECF system this date.

Thank you for your time and attention to this matter.

Respectfully,

COLLERAN, O'HARA & MILLS L.L.P.

A handwritten signature in black ink that reads 'Thomas P. Keane'. The signature is written in a cursive, flowing style.

By: \_\_\_\_\_



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THOMAS P. KEANE

Enclosures  
3028-0010

cc: **VIA ECF**  
Robert J. Axelrod (counsel for Plaintiff)  
Magistrate Judge Lee G. Dunst